

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

## **INITIAL MOTION FOR EXTENSION OF TIME**

Defendants, HARTFORD LIFE INSURANCE COMPANY (“HARTFORD”) and DRESS BARN INCORPORATED GROUP LONG TERM DISABILITY PLAN (“PLAN”), by their attorneys, Donald A. Murday, Elizabeth G. Doolin, Joseph R. Jeffery, and CHITTENDEN, MURDAY & NOVOTNY LLC, pursuant to Fed. R. Civ. P. 6(b), hereby request that this Court enter an order extending by thirty days the time period for HARTFORD and the PLAN to answer or otherwise plead in response to Plaintiff’s Complaint. In support of said Motion, HARTFORD and the PLAN state as follows:

1. HARTFORD was formally served with the Complaint and Summons on or about May 20, 2008.
2. Under Fed. R. Civ. P. 12(a)(1)(A), Hartford's responsive pleading is due on June 9, 2008.
3. HARTFORD and its counsel require an additional period of time in which to gather file materials, evaluate Plaintiff's allegations, and prepare a good faith responsive pleading to same. In accordance with Fed. R. Civ. P. 6(b), HARTFORD requests an additional

thirty (30) days, to and including July 9, 2008, to answer or otherwise plead in response to the Complaint.

4. It is not clear whether the PLAN has been served. Either way, the undersigned counsel has appeared on the PLAN's behalf and requests that the court enter an Order permitting the Plan to file its answer or other responsive pleading by July 9, 2008.

5. This Motion is not brought to unnecessarily delay the proceedings in this matter, but is based on the good faith belief that an additional period of time is necessary in order to draft good faith responsive pleadings. The granting of this Motion will not prejudice any party hereto.

6. HARTFORD's counsel attempted to discuss this Motion with counsel for Plaintiff but learned that counsel is out of town and will not return to the office until June 9, 2008, the date HARTFORD's answer is due.

**WHEREFORE**, Defendants, HARTFORD LIFE INSURANCE COMPANY and DRESS BARN INCORPORATED GROUP LONG TERM DISABILITY PLAN, respectfully request that this Court enter an order granting their Initial Motion for Extension of Time for thirty (30) additional days, to and including July 9, 2008, to answer or otherwise plead in response to Plaintiff's Complaint.

Respectfully submitted,

**HARTFORD LIFE INSURANCE COMPANY  
AND DRESS BAR INCORPORATED GROUP  
LONG TERM DISABILITY PLAN**

By: /s/ Joseph R. Jeffery

One of their attorneys

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**Certificate of Service**

I hereby certify that on **June 5, 2008** I electronically filed the foregoing Defendant Hartford Life and Accident Insurance Company and Dress Barn Incorporated Group Long Term Disability Plan's Initial Motion for Extension of Time with the Clerk of the U.S. District Court, Northern District of Illinois, Eastern Division, using the CM/ECF system which sent notification of such filing to the following CM/ECF registered participants:

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**DATED** this **5th** day of **June, 2008**.

/s/ Joseph R. Jeffery  
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